

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.:

50 2008 CA 0 25129 XXXX MB

A.C.,

Plaintiff(s)

vs.

JEFFREY E. EPSTEIN and SARAH
KELLEN,

Defendant(s).

COMPLAINT

COMES NOW the Plaintiff, A.C., and sues the Defendants, JEFFREY E. EPSTEIN and SARAH KELLEN, and alleges:

1. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000.00), exclusive of costs and interest.
2. At all times material hereto, the Plaintiff, A.C., was and is a resident of Palm Beach County, Florida. Plaintiff is a female who is presently 21 years old.
3. The Plaintiff is unsure of the residency of Defendant, JEFFREY E. EPSTEIN, because he has residences in New York, Florida, New Mexico, and also outside of the continental United States.
4. The Defendant, SARAH KELLEN, was a resident of Florida.

COUNT I

5. Plaintiff incorporated into this count the allegations of paragraphs 1 through 4.
6. While the Plaintiff was a minor, at the age of 17, the Defendant, JEFFREY E. EPSTEIN, intentionally induced and/or seduced the Plaintiff into performing various

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acts of lewd and lascivious conduct and/or sexual performances in his presence. These acts all took place at the mansion owned by the Defendant, JEFFREY E. EPSTEIN, which was located in Palm Beach, Florida.

7. While the Plaintiff was a minor, the Defendant, JEFFREY E. EPSTEIN, performed various acts of lewd and lascivious conduct in the presence of the Plaintiff. These acts all took place at the mansion owned by the Defendant, JEFFREY E. EPSTEIN, which was located in Palm Beach, Florida.

8. While the Plaintiff was a minor, the Defendant, JEFFREY E. EPSTEIN, touched the Plaintiff's breasts and genitalia. These acts all took place at the mansion owned by the Defendant, JEFFREY E. EPSTEIN, which was located in Palm Beach, Florida.

9. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, the Plaintiff demands judgment for damages against Defendant, JEFFREY E. EPSTEIN, in an amount in excess of \$15,000.00s, exclusive of costs and interest, and further demands trial by jury.

COUNT II

10. Plaintiff incorporates into this count the allegations of paragraphs 1 through 4, and paragraphs 6 through 9.

11. For each and every occurrence of sexual abuse of the Plaintiff while she was a minor for whom JEFFREY E. EPSTEIN was responsible, he was aided, assisted,

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Complaint


and/or abetted by Defendant, SARAH KELLEN, who lived at the Palm Beach mansion of JEFFREY E. EPSTEIN. Said acts included, but were not limited to the following:

- a. Facilitated JEFFREY E. EPSTEIN's sexual abuse of Plaintiff by:
 - I. She observed the Plaintiff being brought to the Palm Beach mansion of JEFFREY E. EPSTEIN, when the Plaintiff was a minor, and escorted the Plaintiff to a room in that mansion where JEFFREY E. EPSTEIN was waiting, for the ostensible purpose of providing "massages" to JEFFREY E. EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy and that JEFFREY E. EPSTEIN's plan was to sexually abuse the Plaintiff; and
 - II. She paid the Plaintiff for the "sessions" with JEFFREY EPSTEIN.

12. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, the Plaintiff demands judgment for damages against Defendant, SARAH KELLEN, in an amount in excess of \$15,000.00, exclusive of costs and interest, and further demands trial by jury.

DATED this 21 day of August, 2008.



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